

Exhibit C

Microsoft Office Outlook Web Access

Type here to search This Folder Address Book Options Log Off

Mail Deleted Items Drafts **Inbox (3)** **Junk E-mail [1]** Sent Items

Click to view all folders

Manage Folders...

Reply Reply to All Forward Move Delete Junk Close

RE: Activity in Case 2:14-cv-00553-CCC-MF North Jersey Media Group Inc. v. SarahPac et al Order
 William Dunnegan

You replied on 2/2/2015 6:28 PM.

Sent: Friday, January 30, 2015 10:49 AM
To: Ronald Coleman [rcoleman@goetzfitz.com]
Cc: Richard Weiss; John J. Tiemessen [jti@cplawak.com]; Brian Farkas [bfarkas@goetzfitz.com]

How about this?

Notwithstanding the foregoing, the parties further agree that: (1) news reporters for the plaintiff are free to report on the existence of the settlement, and about what ever facts they learn from sources other than NJMG, and (2) the parties or their respective attorneys or agents may respond freely to questions about the litigation posed by any third party, except that statements about the settlement must be limited to confirming its existence and directing the third party to the court file.

From: Ronald Coleman [mailto:rcoleman@goetzfitz.com]
Sent: Thursday, January 29, 2015 2:13 PM
To: William Dunnegan
Cc: Richard Weiss; John J. Tiemessen; Brian Farkas
Subject: RE: Activity in Case 2:14-cv-00553-CCC-MF North Jersey Media Group Inc. v. SarahPac et al Order
Importance: High

There's a misunderstanding here, and I will take credit for it. Reading your objection, you would seem to have the same "problem" concerning the previous formulation also. Our proposed change was not meant to prevent comment about the litigation but only about the settlement; the problem was that it seemed, if read literally, only to prohibit disclosing information about the settlement in response to narrow questions about the settlement. So if I understand you properly, maybe this would work?:

Notwithstanding the foregoing, the parties further agree that news reporters for the plaintiff are free to report on the existence of the settlement and that the parties or their respective attorneys or agents shall, in response to questions about the litigation posed by any news reporter or third party, [] say regarding the settlement that its existence can be confirmed and direct the third party to the court file. No reference to the settlement amount may be made in any response or court filing in this case.

--
 Ronald D. Coleman
 Goetz Fitzpatrick LLP | 212.695.8100

From: William Dunnegan [mailto:wd@dunnegan.com]
Sent: Thursday, January 29, 2015 1:18 PM
To: Brian Farkas
Cc: Ronald Coleman; Richard Weiss
Subject: Re: Activity in Case 2:14-cv-00553-CCC-MF North Jersey Media Group Inc. v. SarahPac et al Order

Brian,

We cannot agree to that change. While we have agreed in principle that the settlement amount will be confidential, we cannot agree to keep confidential the facts concerning the litigation (which are otherwise a matter of public record).

Bill
 Sent from my Verizon Wireless BlackBerry

From: Brian Farkas <bfarkas@goetzfitz.com>
Date: Thu, 29 Jan 2015 09:48:07 -0600